

Robert I. Sanders, OSB 70125

Email: ris@woodtatum.com

Todd A. Zilbert, OSB 89144

Email: taz@woodtatum.com

Wood Tatum

6915 SW Macadam Avenue, Suite 115

Portland, Oregon 97219

Tel: (503) 224-5430

Fax: (503) 241-7235

George M. Chalos (admitted pro hac vice)

Email: gmc@chaloslaw.com

Chalos & Co, P.C.

123 South Street

Oyster Bay, New York 11771

Telephone: (516) 714-4300

Facsimile: (516) 750-9051

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

**OS SHIPPING CO. LTD., and
ASSURANCEFORENIGEN SKULD
(GJENSIDIG), on its behalf and as subrogee of
OS SHIPPING CO. LTD.,**

Plaintiffs,

v.

**GLOBAL MARITIME TRUST(S) PRIVATE
LIMITED, JS LINE SA, and HONG JAE)
HYUNG a/k/a JAY H. HONG**

Defendants.

Case No. Case No. 3:11-cv-377-BR

IN ADMIRALTY

**DECLARATION OF GEORGE M.
CHALOS IN SUPPORT OF
PLAINTIFF'S MOTION TO APPROVE
CERTAIN FEES AS CUSTODIA LEGIS
EXPENSES**

I, GEORGE M. CHALOS, an attorney at law, declare under penalty of perjury of the laws of
the United States of America as follows:

1 1. I am an attorney admitted to practice *pro hac vice* before this Honorable Court and
 2 am counsel for Plaintiff ASSURANCEFORENIGEN SKULD (GJENSIDIG) (hereinafter “SKULD”
 3 or “Plaintiff”). I am the principal of CHALOS & CO, P.C., and am a member in good standing of the
 4 bars of every Court to which I am admitted.

5 2. I submit this Declaration based on facts and information known to me personally, as
 6 well as documents and information provided to me by my clients and their representatives, all of
 7 which I believe to be true and accurate.

8 3. This Declaration is submitted in support of Plaintiff’s Motion to Approve Certain
 9 Fees As Custodia Legis Expenses.

10 4. As referenced in the Memorandum of Law, true and complete copies of the invoices
 11 provided in connection with the necessary services provided to the vessel during its attachment, are
 12 attached hereto as Exhibit 1.

13 5. These invoices include the following custodial services which have been provided to
 14 the M/V GMT VENUS through May 12, 2011: Columbia River Pilots (USD 1402.67); Shaver
 15 Transportation – Tug (USD 9,165.26); Port of Portland – Dockage & Security T-6 (USD 11,876.00);
 16 Port of Portland – Dockage & Security T-4 (USD 81,055.00); Portland Lines Bureau (USD
 17 2,208.00). The total amount of *custodia legis* expenses incurred through May 12, 2011 is **USD**
 18 **105,706.93**.

19 6. I declare under penalty of perjury of the laws of the United States of America and the
 20 State of Oregon that the foregoing is true and correct.

1 DATED this 12th day of May, 2011

2 CHALOS & CO, P.C.

3
4 /s/ George M. Chalos

5 George M. Chalos (*admitted pro hac vice*)

6 123 South Street

Oyster Bay, New York 11771

7 Telephone: (516) 714-4300

8 Fax: (516) 750-9051

E-mail: gmc@chaloslaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DECLARATION OF GEORGE M. CHALOS**
on the following parties:

C. Kent Roberts
Noah Jarrett
Catherine Brinkman
SCHWABE, WILLIAMSON & WYATT, PC
1211 Southwest Fifth Avenue
Suites 1600-1900
Portland, OR 97204
Email: njarrett@schwabe.com
cbrinkman@schwabe.com
ckroberts@schwabe.com

Owen F. Duffy
Email: ofduffy@gmail.com
Attorneys for Defendant JSL SA

Carl R. Neil
LINDSAY HART NEIL & WEIGLER
1300 SW Fifth Avenue, Suite 3400
Portland, OR 97201-5640
Email: cneil@lindsayhart.com
Attorneys for Cargo Owner Hyundai Motor America Corporation

by CM/ECF a true and correct copy hereof to said parties on the date below:

DATED this 12th day of May, 2011.

CHALOS & CO, P.C.

/s/ George M. Chalos
George M. Chalos (*admitted pro hac vice*)
123 South Street
Oyster Bay, New York 11771
Telephone: (516) 714-4300
Fax: (516) 750-9051
E-mail: gmc@chaloslaw.com
Attorney for Plaintiffs